

**Z** **Zabell & Associates, P.C.**  
EMPLOYMENT COUNSELING, LITIGATION, LABOR & BENEFITS LAW

Counseling and Advising Clients Exclusively on Laws of the Workplace

Zabell & Associates, P.C.  
1 Corporate Drive  
Suite 103  
Bohemia, New York 11716  
Tel. 631-589-7242  
Fax. 631-563-7475  
[www.laborlawsny.com](http://www.laborlawsny.com)

**Janine L. Kapp**  
Email: [JKapp@laborlawsny.com](mailto:JKapp@laborlawsny.com)

January 4, 2017

**VIA ELECTRONIC CASE FILING**

The Honorable A. Kathleen Tomlinson  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: **Thornburn v. Door Pro America, Inc.**  
**Case No.: 16-cv-03839 (DRH) (AKT)**

Your Honor:

This firm is counsel to Plaintiff in the above-referenced matter. The parties met and conferred to attempt to revise the Protective Order discussed during the conference call on December 21, 2016. We are unable to agree on certain provisions and respectfully submit the most recent version of the Protective Order as Exhibit A. We note that Mr. Chong objects to certain paragraphs in the Protective Order as well as the instant filing. We invited him to file a submission with his proposed language.

We remain available should Your Honor require additional information in connection with this submission.

Respectfully submitted,

**ZABELL & ASSOCIATES, P.C.**

  
Janine L. Kapp

cc: Client  
Michael K. Chong, Esq. (via Electronic Case Filing)